

MEMO ENDORSED

RICHARD PALMA
ATTORNEY AT LAW
122 EAST 42nd STREET - SUITE 620
NEW YORK, NEW YORK 10168

MEMBER OF THE BAR
NEW YORK & FLORIDA

TEL. (212) 686-8111
FAX. (212) 202-7800
E-MAIL: rpalma177@gmail.com

August 5, 2021

Hon. Katherine Polk Failla
United States District Judge
U.S. District Court for S.D.N.Y.
500 Pearl Street
New York, N.Y. 10007

Re: U.S. v. Cuartas Villeagas, et al., 21 Cr. 099 (KPF)
Joint Defense Request for U.S. Marshals Service to
Produce Below-Named Defendants to U.S. Courthouse
for Co-Defendant Meeting.

Dear Judge Failla:

In order to have a Co-Defendant meeting, Co-Counsels, Ms. Zawadi Baharanyi and Mr. Daniel Parker, and I respectfully request that Your Honor order the U.S. Marshals Service to produce our respective clients (Pablo Camero Bernal #217003331, Jesus Morelo Castillo #20210344, and Jose Castillo Berrio #217003340) at the Southern District of New York courthouse on Wednesday, August 18, 2021.

By way of background, before seeking Your Honor's intervention in this matter, we made this request to Ms. Kathy Coley, Warden's Assistant, of the Essex County Correctional Center who declined it yesterday based on the Warden's order citing "COVID/Social distancing" concerns. See Attached Email. If Your Honor were to grant our request to have the clients produced at the courthouse, we propose conducting the meeting in the large attorney-client conference cell located on the 4th Floor. In addition to the attorneys and the clients, a Spanish Interpreter would participate in this meeting. It is my understanding that all attorneys and

Page 2

Hon. Katherine Polk Failla, U.S.D.J.

August 5, 2021

interpreter are vaccinated and would take the necessary precaution of wearing masks at the meeting.

If there are any questions about this request, we are prepared to address them more thoroughly at Your Honor's convenience. We await the Court's instructions.

Thank you.

Respectfully submitted,
s/Richard Palma
Richard Palma

Encl. Attachment (Ex. E-mail)

Application GRANTED. The U.S. Marshals Service is hereby ORDERED to produce Defendants Pablo Camero Bernal, Jesus Morelo Castillo, and Jose Castillo Berrio in Courtroom 618 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York on **August 18, 2021 at 10:00 a.m.** This order of production is for the limited purpose of permitting the aforementioned defendants to meet with their counsel. This co-defendant meeting is to terminate no later than 12:00 p.m. on that same day, at which time the defendants are to be returned to the Essex County Correctional Center.

Date: August 6, 2021
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE